

Sub-Element 3.c— Implementation of Protective Actions for Special Populations

<p>What the Policy Says</p>	<p>Intent NUREG-0654 provides that OROs should have the capability to implement protective action decisions, including evacuation and/or sheltering, for all special populations. Focus is on those special populations that are (or potentially will be) affected by a radiological release from a nuclear power plant.</p> <p>Minimum Frequency Criteria 3.c.1 and 3.c.2 are to be evaluated once in 6 years. Plume phase and post-plume phase can be demonstrated separately.</p> <p>Criterion 3.c.1: Protective action decisions are implemented for special populations other than schools within areas subject to protective actions. (NUREG-0654, J.10.c, d, g).</p> <p>Extent of Play Applicable OROs should demonstrate the capability to alert and notify (for example, provide protective action recommendations and emergency information and instructions) special populations (hospitals, nursing homes, correctional facilities, mobility impaired individuals, transportation dependent, etc.). OROs should demonstrate the capability to provide for the needs of special populations in accordance with the ORO's plans and procedures.</p> <p>Contact with special populations and reception facilities may be actual or simulated, as agreed to in the Extent of Play. Some contacts with transportation providers should be actual, as negotiated in the extent of play. All actual and simulated contacts should be logged.</p> <p>All implementing activities associated with protective actions for special populations must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.</p>
	<p>Criterion 3.c.2: OROs/School officials implement protective actions for schools. (NUREG-0654, J.10.c, d, g).</p> <p>Extent of Play Public school systems/districts shall demonstrate the ability to implement protective action decisions for students. The demonstration shall be made as follows:</p> <p>At least one school in each affected school system or district, as appropriate, needs to demonstrate the implementation of protective actions. The implementation of canceling the school day, dismissing early, or sheltering should be simulated by describing to evaluators the procedures that would be followed.</p>

	<p>If evacuation is the implemented protective action, all activities to coordinate and complete the evacuation of students to reception centers, congregate care centers, or host schools may actually be demonstrated or accomplished through an interview process.</p> <p>If accomplished through an interview process, appropriate school personnel, including decision making officials (for example, superintendent/principal, transportation director/bus dispatcher) and at least one bus driver (and the bus driver's escort, if applicable), should be available to demonstrate knowledge of their role(s) in the evacuation of school children.</p> <p>Communications capabilities between school officials and the buses, if required by the plan and/or procedures, should be verified.</p> <p>Officials of the school system(s) should demonstrate the capability to develop and provide timely information to OROs for use in messages to parents, the general public, and the media on the status of protective actions for schools.</p> <p>The provisions of this criterion also apply to any private schools, private kindergartens and day care centers that participate in REP exercises pursuant to the ORO's plans and procedures as negotiated in the Extent of Play Agreement.</p> <p>All activities must be based on the ORO's plans and procedures and completed, as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.</p>
<p>Preparing to Evaluate These Criteria</p>	<p>Criterion 6.c.1</p> <p>Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement:</p> <ul style="list-style-type: none"> • Who will notify special populations? • What is the method used to notify special populations? <ul style="list-style-type: none"> ➢ EAS or other notification method, ➢ Telephone, ➢ Tone-alert radio, ➢ Telecommunications devices for the deaf (TDD/TTY), ➢ Other. • Who will identify and notify transportation resources/alternate locations for special populations, if necessary? • Where are these locations and resources? • If there is a gap in resources, how will back up transportation resources and/or alternate locations for special populations be identified? • What emergency response actions are the administrators of facilities that have special populations required to implement?

Criterion 6.c.2

Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement:

- Does the plan indicate the school district(s) located within the EPZ?
- Does the plan address licensed day care centers and private schools?
- Do the schools have separate plans?
- Who (title and organization) notifies the school district(s) and by what means?
- At what ECL would the school district(s) be notified?
- What precautionary protective actions can the school district(s) take?
- What is the school population, including all staff?
- Where would students be transported?
- Who would notify bus drivers and where do the bus drivers report?
- What is the potential number of buses available?
- How would parents of students be notified?
- Does the plan indicate how soon information would be provided to parents regarding the status of their children?
- Are there schools located outside the EPZ that have students who live within the EPZ? What are the arrangements for these students?
- Does the plan indicate the type of communications capabilities between the buses and the school officials?
- How does the plan indicate school officials will provide information to OROs on the status of school children?

Out-of-Sequence – Interview/Demonstration:

- Will this be an out-of-sequence school demonstration?
- If out-of-sequence, will interviews be conducted or will there be an actual demonstration?
- If interviews only, where, when and with whom will they be conducted?
- Does the extent of play indicate time and location of school to be evaluated by interview?
- Does the extent of play indicate who will be available for the interview and are any specifics indicated, such as availability of dosimetry kits, appropriate maps, etc.?
- If this is to be an actual demonstration: does the extent of play indicate time and location of school?
- Does the extent of play indicate who must be available and what actions must occur?
- Will actions include a demonstration by the bus driver to travel from the school to the relocation site?

During the Exercise	Evaluating Criterion 6.c.1 During the exercise, in addition to evaluating activities related to the items listed above, be sure to: <ul style="list-style-type: none">• Record the PAD and the time the PAD was reached or received for special populations.• Identify the groups that were notified. Check for up-to-date lists of special populations.• Check to see if the administrator of each special population's facility has a current plan?• Note the method(s) used to make notifications and who made the notifications.• Document the names of the transportation provider companies including special resources for disabled persons (some calls to transportation providers should be actual calls, as indicated in the extent of play). All calls, real and simulated, should be logged (obtain a copy of the log maintained of both actual and simulated calls to special populations and transportation resources).• Note any gaps identified between the transportation resources needed and the resources available and whether alternate resource providers were identified and resources provided.
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	<p>Evaluating Criterion 6.c.2</p> <p>During the exercise, in addition to evaluating activities related to the items listed above, be sure to:</p> <ul style="list-style-type: none"> • Record the ECL, time, and who notified school official(s). (All school district(s) must be contacted.) • Note what protective action was used: <ul style="list-style-type: none"> ➢ Cancellation of School, ➢ Early dismissal, ➢ Shelter-in-Place, or ➢ Evacuate. • Note what method was used to notify parents. • Observe whether there was coordination with the ORO's Public Information Officer to determine the correct information on the status of protective actions for schools. <p><u>Out-of-sequence – Interview:</u></p> <ul style="list-style-type: none"> • Note who would notify the school. • Note at what ECL would the school be notified. • Observe whether there is a current copy of the plan available at the school. • Determine what actions the school would take. • Determine whether the bus driver is aware of where to take the students or has a current map to the location. • If required by the plan, note if the bus driver is knowledgeable about emergency worker exposure control (dosimetry). • Determine what responsibilities the school has after the children arrive at the reception center. • Note who notifies the parents of actions taken to protect the students, and when. • Document the communication systems used to notify schools and parents. <p><u>Out-of-sequence – Actual Demonstration:</u></p> <ul style="list-style-type: none"> • Observe whether the school has a current copy of the plan available. • Determine who notified the school and how they received the notification. • Determine who notified the bus drivers to mobilize and how they received the notification. • Note whether the bus driver had an accurate map of the route, if needed. • Note how the school communicated with the bus drivers while they are en route, if required in the plan. • If required, determine whether the bus driver is knowledgeable about emergency worker exposure control (dosimetry). • Determine what responsibilities the school has after the children arrive at the reception center. • Note who notifies the parents of actions taken to protect the students, and when.
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